



Plaintiffs against the Defendant for the alleged accident which occurred in Richland County, South Carolina.

3. Venue is proper in this matter in the Columbia Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff Robert Immordino alleges that as a result of this accident, he has suffered physical pain and suffering; loss of income; loss of enjoyment of life; substantial expenses for medical services; mental anguish; shock; fear; embarrassment; expenses for transportation and medical services; and actual and punitive damages. Plaintiff Allison Immordino is claiming loss of consortium damages as a result of the injuries her husband sustained in this accident.

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Complaint is filed herewith contemporaneously.

6. Defendant has furnished a copy of this Notice of Removal to the Clerk of Court for Richland County.

Respectfully submitted,

**SWEENEY, WINGATE & BARROW, P.A.**

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Columbia, South Carolina  
February 15, 2021